

United States District Court
Southern District of Texas
FILED

MAR 21 2017

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN DIVISION

UNITED STATES OF AMERICA

v.

KERENA ALMEIDA-CEDILLO

ANGEL RUIZ-GARCIA

true: WANDA CEPEDA-SANTIAGO
aka: Wanda Cepeda (ss 9/20/17)

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Criminal No.

M-17-431

SEALED INDICTMENT

THE GRAND JURY CHARGES:

Count One

(Mail fraud conspiracy)

From on or about October 2013 and up until the date of the indictment, in the Southern District of Texas and elsewhere and within the jurisdiction of the Court, the defendants,

KERENA ALMEIDA-CEDILLO

ANGEL RUIZ-GARCIA

and

true: WANDA CEPEDA-SANTIAGO
aka: wanda Cepeda (ss 9/20/17)

did, with the intent to further the object of the conspiracy, knowingly combine, conspire, confederate, and agree together and with other persons known and unknown to the grand jurors to knowingly and with the intent to defraud, devise and intend to devise a scheme and artifice to defraud and to obtain money and property from others by means of materially false and fraudulent pretenses, representations, and promises, and knowingly cause to be delivered certain mail matter by the United States Postal Service and by private and commercial interstate carrier for the purpose of executing the scheme.

Object of the Conspiracy

It was the object of the conspiracy for the defendants to obtain money from individuals by selling membership in a non-federally recognized Indian tribe, alleging that tribal membership would allow the tribe member, despite being an alien with no legal status to be in the United States, to remain in, travel within, and work in the United States solely based on the tribal membership, and thus circumvent the immigration laws of the United States.

Manner and Means of the Conspiracy

In furtherance of the conspiracy, defendants would claim that membership in the Yamassee tribe would prevent deportations and would allow individuals without legal status to live and work legally in the United States.

Defendants would meet with individuals, either individually or in groups, in various venues regarding the Yamassee tribe.

Defendants would offer membership in the Yamassee tribe in exchange for money. This membership would allow the prospective tribe members to obtain tribal documentation, which could allegedly be used to remain legally in, travel within, and work in the United States solely based on tribal membership.

Defendant Almeida-Cedillo would collect money from prospective members and would transmit membership applications and related information by United States Postal Service mailings
United Parcel Service
and by ~~Federal Express~~ deliveries to coconspirators outside the state of Texas.

Defendants would cause to be delivered by United States Postal Service mailings and
United Parcel Service
~~Federal Express~~ deliveries identification documents, including tribal identification cards and driver's licenses.

In violation of Title 18, United States Code, Sections 1341 and 1349.

10/24/18

Count Two

(Possession of unlawfully produced document or identification feature that appeared to be issued under the authority of the United States)

On or about February 23, 2017, in the Southern District of Texas and within the jurisdiction of the court, the defendant,

KERENA ALMEIDA-CEDILLO

did knowingly possess an identification document or authentication feature of the United States, to wit, a card bearing State Department Authentication Number #04010010-1, knowing that such identification document or authentication feature was stolen or produced without such authority.

It is further alleged that such identification document or authentication feature was or appeared to be issued by or under the authority of the United States.

In violation of Title 18, United States Code, Sections 1028(a)(6) and 1028(b)(1)(A)(i).

Count Three

(Possession with intent to transfer five or more documents)

On or about February 23, 2017, in the Southern District of Texas and within the jurisdiction of the court, defendant,

KERENA ALMEIDA-CEDILLO

did knowingly possess with intent to transfer unlawfully five or more false identification documents, authentication features, or false identification documents, to wit, identification cards and driver's licenses, that appeared to be issued by or under the authority of the United States Government.

In violation of Title 18, United States Code, Sections 1028(a)(3) and 1028(b)(2)(B).

Count Four

(Fraud and misuse of visas, permits, and other documents)

From on or about October 2013 and up until the date of the indictment, in the Southern District of Texas and elsewhere within the jurisdiction of the court, the defendants,

KERENA ALMEIDA-CEDILLO

ANGEL RUIZ-GARCIA

and

true: WANDA CEPEDA-SANTIAGO

aka: Wanda Cepeda

(ss 9/20/17)

did cause to be counterfeited or made immigrant visas, nonimmigrant visas, permits, border crossing cards, alien registration receipt cards, or other documents prescribed by statute or regulation for entry into or as evidence of authorized stay or employment in the United States, that is, tribal identification cards and driver's licenses for a non-federally acknowledge tribe.

In violation of Title 18, United States Code, Sections 1546(a) and 2.

A TRUE BILL

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FOREPERSON

ABE MARTINEZ

ACTING UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY